

Federal Defenders
OF NEW YORK, INC.

Southern District
52 Duane Street-10th Floor, New York, NY 10007
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

November 18, 2015

BY ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square, Room 415
New York, New York 10007

Re: United States v. Jeff C. Yin, et. al.,
Docket No. 15 cr. 706 (VSB)

Honorable Judge Broderick:

I write to request a slight modification of one of the conditions of release for Jeff Yin. The government objects to my request.

On October 29, 2015 this Court set a string of conditions, (ECF entry # 69, EX A.) including the posting of \$1,000,000 to secure a \$2,000,000 bond. We ask that the court allow the bond to be secured by \$1,000,000 less \$ 60,000--\$ 940,000. The government objects.

Mr. Yin's mother is still living in New York with Jeff and there isn't anyone in California who can assist the family.

There is little reason to oppose this request; the remaining conditions are stringent and have been met. And, it can hardly be said that Mr. Yin would flee because the bond is secured by \$940,000, as opposed to \$1,000,000 dollars.

Again, to make sure the court is aware of the prosecutor's position -- they object. We nevertheless, ask the court to grant our request and modify this one condition of release.

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Thank you for considering this request.

Respectfully submitted,

/s/

Sabrina P. Shroff
Assistant Federal Defender

SPS/jl

Cc: AUSA Daniel Richenthal (via email)
AUSA Janis Echenberg (via email)
AUSA Rahul Mukhi (via email)